

Philip S. McCune, WSBA #21081
J. Chad Mitchell, WSBA #39689
Summit Law Group PLLC
315 Fifth Avenue South, Suite 1000
Seattle, WA 98104-2682
Tel: (206) 676-7000
Fax: (206) 676-7001
philm@summitlaw.com
chadm@summitlaw.com

Sean M. Kneafsey (*pro hac vice*)
Kneafsey & Friend LLP
800 Wilshire Boulevard, Suite 710
Los Angeles, CA 90017
Tel: (213) 892-1200
Fax: (213) 892-1208
skneafsey@kneafseyfriend.com

Attorneys for Plaintiff Thermapure, Inc.

The Honorable Robert H. Whaley

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

THERMAPURE, INC., a California
corporation,

Plaintiff,

v.

JUST RIGHT CLEANING &
CONSTRUCTION, INC., a Washington
corporation,

Defendant.

JUST RIGHT CLEANING &
CONSTRUCTION, INC., a Washington
corporation,

Counterclaimant,

v.

THERMAPURE, INC., a California
corporation,

Counterdefendant.

CASE NO. C11-00431-RHW

**PLAINTIFF'S MOTION TO
EXPEDITE**

Note for motion calendar:

08/06/2013

Without Oral Argument

1 Pursuant to LR 7.1(h)(2)(C), Plaintiff Thermapure, Inc. respectfully requests
2 the Court to resolve Plaintiff's Motion to Exceed Page Limit ("Motion to Exceed")
3 on an expedited basis. Good cause exists to hear this matter on an expedited basis as
4 follows.

5 Plaintiff's Motion to Exceed would normally be set for hearing without oral
6 argument on August 29, 2013, which is the same day the hearing on Defendant's
7 Motion for Attorneys Fees (ECF No. 103) will be heard. As Plaintiff is seeking to
8 exceed the page limit in its response to Defendant's attorney fee motion, Plaintiff is
9 filing this Motion to Expedite so that the page limit issue can be ruled upon before
10 the attorney fee motion telephonic hearing at 9:30 a.m. on August 29. Counsel for
11 Thermapure has attempted to contact counsel for Just Right via telephone and email,
12 but as of the filing of this motion, Thermapure's counsel has not received a response
13 as to whether Just Right will oppose this motion

14 Therefore, Plaintiff requests that its Motion to Exceed Page Limit be heard on
15 August 6, 2013, or at another time convenient for the Court, but before the August
16 29, 2013 attorney fee motion hearing date.

17 DATED this 30th day of July, 2013.

18 Respectfully Submitted,

19 KNEAFSEY & FRIEND LLP

20 By s/ Sean M. Kneafsey

21 Sean M. Kneafsey (*pro hac vice*)
22 800 Wilshire Boulevard, Suite 710
23 Los Angeles, CA 90017
24 Tel: (213) 892-1200
25 Fax: (213) 892-1208
26 skneafsey@kneafseyfriend.com

SUMMIT LAW GROUP PLLC

By s/ J. Chad Mitchell

J. Chad Mitchell, WSBA #39689

Philip S. McCune, WSBA #21081

315 Fifth Avenue S., Suite 1000

Seattle, WA 98104-2682

Tel: (206) 676-7000

Fax: (206) 676-7001

chadm@summitlaw.com

philm@summitlaw.com

Attorneys for Plaintiff Thermapure, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Joel B. Ard
Ellen Alexandra Gilliland
Janelle Milodragovich
Foster Pepper PLLC
111 Third Avenue, Suite 3400
Seattle, WA 98101
ardjb@foster.com
gilla@foster.com
miloj@foster.com

Irene Margret Hecht
Keller Rohrback LLP
1201 Third Avenue, Suite 3200
Seattle, WA 98101
ihecht@kellerrohrback.com

Timothy P. Cronin
Mullin Cronin Casey & Blair PS
115 N Washington, Third Floor
Spokane, WA 99201
timcronin@mccblaw.com

DATED this 30th day of July, 2013.

s/ Deanna L. Schow

Deanna L. Schow
Summit Law Group, PLLC
315 Fifth Avenue S., Suite 1000
Seattle, WA 98104-2682
Tel: (206) 676-7000
deannas@summitlaw.com